

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

PENDLETON HEIGHTS GAY-STRAIGHT
ALLIANCE, an unincorporated association,

Plaintiff,

Case No: 1:21-cv-02480-JRS-TAB

v.

SOUTH MADISON COMMUNITY SCHOOL
CORPORATION; PRINCIPAL, PENDLETON
HEIGHTS HIGH SCHOOL, in her official
capacity,

Defendants.

AFFIDAVIT OF ASHLEY ZUKOWSKI

1. My name is Ashley Zukowski, I am over eighteen (18) years of age, and I have personal knowledge of the facts stated herein.
2. I am a school counselor at Pendleton Heights High School.
3. I am also a sponsor for Students Against Destructive Decisions (SADD).
4. I receive a stipend as the sponsor of SADD because it is a corporation-sponsored club.
5. Students in SADD provide educational programs and information to the student body of Pendleton Heights High School, teachers, and community members about risky or dangerous behaviors, and they promote making good choices and a healthy lifestyle.

6. Students in SADD participate in peer-to-peer events and make, organize, and present educational programs addressing risky behaviors such as substance abuse, texting while driving, and relationships with peers through online activity.

7. Students of SADD have prepared and presented a professional development program to the teachers at Pendleton Heights High School about the dangers of vaping and recognizing vaping activity of students who are trying to hide their vaping activities.

8. Students in SADD learn about a given health and/or interpersonal relations topic and then develop and share prevention programming on that topic.

9. Students in SADD have written, organized, and prepared presentations that they delivered to elementary school students about healthy relationships, traffic safety, bullying, substance abuse, mental health, and digital citizenship.

10. The students of SADD plan and present a traveling exhibit and program called “Hidden in Plain Sight,” which is designed to help parents of teens recognize unfamiliar hazards that are often in plain sight.

11. The Hidden in Plain Sight program includes an interactive exhibit of a simulated teenager’s bedroom. That interactive exhibit is used to explain the areas and items of concern that are in plain sight but may not be immediately recognized as a health concern or danger.

12. The Students in SADD participate in Red Ribbon Week by providing educational materials to students that promote a drug-free lifestyle and provide students with fidgets to address anxiety instead of turning to drugs to address their anxiety.

13. The students in SADD participate in the Great American Smokeout Day by developing, selecting, and providing educational materials and programs about the dangers of vaping or nicotine.

14. Students in SADD engage in public speaking events at our elementary schools where they give presentations to students in grades 4-6 about traffic safety, healthy relationships, bullying, texting while driving, drinking while driving, Digital Citizenship and Cyber Safety.

15. Students in SADD design and present a convocation at school prior educating the student body on the risks and dangers of substance abuse.

16. By organizing, writing, presenting, and otherwise executing the programs of SADD, the students in SADD demonstrate leadership, public speaking, and communication skills.

17. The events organized by the students in SADD allow students to demonstrate the following Indiana Employability Skills as identified in the Indiana Employability Skills Standards:

- a. Effective Communication: Applying skills to clearly, effectively, and convincingly express ideas and messages to others appropriate to the environment.

18. The activities, programs, and educational sessions of SADD are designed to directly incorporate the curriculum of Interpersonal Relations, Health and Wellness, and Human Development and Family Wellness, which are taught at Pendleton Heights High School.

19. The Indiana Standards for Health and Wellness include the following requirements for students in grades 9-12, which are directly related to the activities of SADD:

Reading for Literacy in Technical Subjects (i.e., Health & Wellness):

Students need to develop the skills that allow them to read complex informational health texts with independence and confidence. Students need to build an appreciation of the norms and conventions of reading in health, an understanding of domain-specific words and phrases, an attention to precise details, the capacity to evaluate detailed arguments, synthesize complex information and follow detailed descriptions and procedures. Students need to be able to gain knowledge from challenging texts that make use of elaborate diagrams and data to convey information and illustrate concepts.

20. The following Interpersonal Relationships standards are required by the Indiana Department of Education and are directly related to the activities of SADD:

a. Integration of Knowledge and Ideas

RT.7 - Translate quantitative information expressed in words in a text into visual form (e.g., a table or chart) and translate information expressed visually or mathematically (e.g., in an equation) into words.

b. Research to Build and Present Knowledge

WT.7 – Conduct short as well as more sustained research projects to answer a question (including a self-generated question) or solve a problem; narrow or broaden the inquiry when appropriate; synthesize multiple sources on the subject, demonstrating understanding of the subject under investigation.

WT.8 – Gather relevant information from multiple authoritative print and digital sources, using advanced searches effectively; assess the usefulness of each source in answering the research question; integrate information into the text selectively to maintain the flow of ideas, avoiding plagiarism and following a standard format for citation.

c. Standard 1: Students will comprehend concepts related to health promotion and disease prevention to enhance health.

HW.1.4 Examine the impact that genetics can have on personal health.

Example: Examine personal health-related actions that can reduce the risk and/or delay the onset of potential genetic and family health problems.

HW.1.5 Formulate ways to prevent or reduce the risk of health problems.

Example: Identify and develop approaches to educate peers (adolescents) about risk reduction (e.g., teen pregnancy, suicide, bullying, abuse, etc.).

HW.1.7 Summarize the benefits and barriers to practicing healthy behaviors.

Example: Construct a list of practices to reduce and/or prevent stress and identify ways to overcome barriers.

HW.1.8 Predict susceptibility to injury or illness if engaging in unhealthy behaviors.

Example: Investigate adolescent risk behaviors which could lead to injury or illness.

d. Standard 2: Students will analyze the influence of family, peers, culture, media, technology and other factors on health behaviors.

HW.2.3 Examine how adolescents influence healthy and unhealthy behaviors.

Example: Examine how peers can positively or negatively influence others regarding the use of anti-social words and actions.

HW.2.4 Assess how the school and community can influence health practices and behaviors.

Example: Assess programs (“Prom Promise”, “Don’t Drink and Drive,” “White Lies,” etc.) that can help students identify, avoid or cope with potentially dangerous situations.

HW.2.5 Analyze the effect of media on personal health.

Example: Compare and contrast how media can send messages about behaviors that can have a positive or negative effect on personal health and wellness.

HW.2.6 Analyze the impact of technology on personal and family health.

Example: Examine how technology can have adverse effects on personal and family health (e.g., Internet pornography, chat lines, inaccurate health information).

HW.2.7 Examine how norms influence health-related behaviors.

Example: Recognize how perceived norms may not reflect actual health behaviors (e.g., teen alcohol use, tobacco use, sexual activity, dating, regular physical activity, etc.).

HW.2.9 Examine how some health risk behaviors can influence the likelihood of taking part in other unhealthy behaviors.

Example: Debate how using tobacco can increase the risk of using marijuana and/or describe how using alcohol can lead to poor decision making.

e. Standard 3: Students will demonstrate the ability to access valid information and products and services to enhance health.

HW.3.4 Examine when professional health services may be required.

Example: Identify when eating habits and/or weight loss techniques may not be having a positive effect on the body and that professional health services are recommended.

f. Standard 4: Students will demonstrate the ability to use interpersonal communication skills to enhance health and avoid or reduce health risks.

Effective communication enhances personal, family, and community health. This standard focuses on how responsible individuals use verbal and non-verbal skills to develop and maintain healthy personal relationships. The ability to organize and to convey information and feelings is the basis for strengthening interpersonal interactions and reducing or avoiding conflict. Students demonstrate refusal, negotiation and collaboration skills to enhance health and avoid or reduce health risks. Students organize and convey information and feelings for strengthening interpersonal [relations].

21. The following Interpersonal Relationships standards are required by the Indiana Department of Education and are directly related to the activities of SADD:

IR-5.2 Demonstrate effective responses to conflict and harassment in career, community, and family settings

IR-5.4 Assess community resources, services, and agencies that support conflict prevention, resolution, and management

22. The following Human Development and Wellness standards are required by the Indiana Department of Education and are directly related to the activities of SADD:

HDW-1.6 Demonstrate fundamentals to career success (e.g. strong work ethic, time management, positive attitude, adaptability/flexibility, stress resilience, accountability, self-discipline, resourcefulness, cooperation, self-assessment)

HDW-4.2 Examine connections among physical, emotional, social, and intellectual aspects of human development and wellness, including consequences of risky behaviors

HDW-4.3 Investigate effects of life events and contemporary issues on human development and wellness across the lifespan and stage of family life (i.e., unemployment, death, divorce, addictions, disorders, family violence, chronic illnesses, depression, stress, and other challenging issues)

HDW-4.4 Identify common defense mechanisms and patterns of reaction used by individuals and families in times of crisis (e.g., divorce, death, illness, unemployment, etc.)

HDW-4.5 Describe coping strategies that promote individual and family wellness in times of crisis

HDW-5.5 Recommend actions to take in cases of addictions, violence toward self and others, and other destructive actions

HDW-5.2 Demonstrate ways to handle stress and depression

HDW-5.5 Recommend actions to take in cases of addictions, violence toward self and others, and other destructive actions

23. By participating in the activities of SADD students demonstrate a deeper learning for the subject beyond the classroom and they build leadership skills, such as teamwork, communication, problem solving, critical thinking, and citizenship.


24. The Indiana Department of Education in its *Graduation Pathways Policy Guidance* document recognizes SADD as an extracurricular activity that has service as one of its primary objectives, which allows students to be engaged both in a school-based activity and meaningful service.

25. SADD provides a service-based learning experience for students.

26. The activities performed by the students in SADD satisfy the graduation requirement for Employability Skills.

27. If a student meaningfully engages and participates in planning and implementing of the activities of SADD, I can sign-off on those student's record indicating he or she has satisfied his or her Employability Skills requirement for graduation.

Date: 12/9/2021_____



Ashley Zukowski